

MICHAEL LEHNERS, ESQ.
429 Marsh Ave.
Reno, Nevada 89509
Nevada Bar Number 003331
(775) 786-1695
email michaellehners@yahoo.com
Attorney for Debtor

Eq 9/4/14

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEVADA

oOo

IN RE

SPEED TECHNOLOGIES, LLC,

Debtor(s).

BK-N- 14-51413-btb
CHAPTER 11

Hearing Date: OST Requested
and Time: _____

Mtn No. _____

Est Time: 25 Minutes

AFFIDAVIT OF COUNSEL IN SUPPORT
OF MOTION TO SHORTEN TIME

I, Michael Lehnors, do hereby swear under the penalty of perjury that the assertions of this affidavit are true.

1. That I am a resident of Washoe County, Nevada and over 18 years of age. This Affidavit is based upon my personal knowledge except for such matters are stated on information and belief, and to those items, I believe them to be true. This Affidavit is made in support of the pending Motion for Order Shortening Time. This Affidavit represents my testimony if called upon to present same in court.

2. That I was retained by the Debtor on August 18, 2014 to file the instant bankruptcy. The purpose of the bankruptcy was to stop the sale of substantially all of the Debtor's assets by the Debtor's former landlord, Bianchi Estates.

1 3. That I have spoken to Bianchi Estates' attorney, Sallie
2 Armstrong, Esq., prior to filing this motion. While we seemed to agree
3 that the property needed to be turned over so Bianchi Estates could re-
4 let the premises, we did not come to terms upon the time in which to do
5 it. Ms. Armstrong suggested any motion for turnover be heard on
6 October 2, 2014.

7 4. As stated in the motion for order shortening time, the Debtor
8 needs immediate access to all of its equipment in order to book clients
9 for its schools and racing activities.

10 5. That I have offered Ms. Armstrong the following adequate
11 protection: Monthly interest payments at 5.25% on the disputed amount.
12 Payment of pro-rated rent while the equipment is removed from the
13 premises and proof of insurance coverage on the items being removed.

14 6. That my motion in no way seeks an adjudication of the
15 competing interests in the property held by the Debtor and Bianchi
16 Estates. It only seeks turnover subject to the tender of adequate
17 protection. For those reasons, I do not believe the hearing of this motion
18 on shortened time will result in a burden on this Court's calendar.

19 FURTHER YOUR AFFIANT SAYETH NOT

20
21 Dated: This 3 day of Sept 2014

22
23 _____
Michael Lehnert

24 Subscribed and sworn to before me
25 this 3 day of Sept, 2014

26 _____
27 NOTARY PUBLIC

